

September 1, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Subscriber Acknowledgement Report (September 1, 2005)**
i2 Telecom International, Inc.; WC Docket No. 05-196

Dear Ms. Dortch:

i2 Telecom International, Inc. ("i2"), through its undersigned counsel and in response to the Public Notice issued by the Enforcement Bureau ("Bureau") on August 26, 2005 ("Public Notice"), submits this Subscriber Acknowledgement Report ("Report") to advise the Commission of the status of i2's efforts to comply with Commission Rule 9.5(e). i2 previously filed a Subscriber Acknowledgement Report on August 10, 2005 in response to the Bureau's July 26, 2005 Public Notice ("August 10 Report").

As requested in the Public Notice, i2 responds to the following questions set out in the Public Notice:

- 1) **A detailed explanation regarding current compliance with the notice and warning sticker requirements if the provider did not notify and issue warning stickers or labels to 100% of its subscribers by the July 29, 2005 deadline. Providers expected to update this information include those that were in the process of providing notice and/or stickers to their subscribers, but had not completed the process by July 29, 2005.**

As previously described in response to Question 4 of i2's August 10 Report, i2 sent advisories and warning labels to all of its subscribers.

- 2) **A quantification of the percentage of the provider's subscribers that have submitted affirmative acknowledgements as of the date of the September 1 and September 22 reports, and an estimation of the percentage of subscribers from whom the provider does not expect to receive an acknowledgement by September 28, 2005.**

As of August 31, 2005, i2 has obtained affirmative acknowledgement from approximately 91% of its subscriber base. i2 cannot predict with certainty what its final response rate

will be, but estimates that 9% of its customers will still not have provided affirmative acknowledgement by September 28, 2005.

3) A detailed description of any and all actions the provider plans to take towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory.

As previously described in response to Question 5 of i2's August 10 Report, i2 is continuing its campaign to contact and obtain affirmative acknowledgment from all of its subscribers. i2 continues to send out notices via U.S. Mail, E-Mail, and also telephones subscribers who have not yet submitted an affirmative acknowledgement.

For those customers that do not provide affirmative acknowledgement, on September 28, 2005, i2 currently plans to disconnect such customers from their service until they provide the required affirmative acknowledgement. Upon disconnection it is anticipated that customers will call into i2's Customer Service Department and request service repair. At this time, it is i2's intention to instruct customers that their service will be reinstated upon affirmative acknowledgement via the i2 website, or U.S. Mail, or fax receipt of the letter that i2 has provided.

4) A detailed description of any and all plans to use a "soft" or "warm" disconnect (or similar) procedure for subscribers that fail to provide an affirmative acknowledgement by September 28, 2005.

At this time, i2 has no plans to use a "soft" or "warm" disconnect procedure. Disconnected customers will have no access to VoIP service until after i2 receives their affirmative acknowledgement. Approximately 99% of those customers that have not provided affirmative acknowledgement also have not used the service in the past 30 days. The Company does not believe that implementing a "soft" or "warm" disconnect procedures would result in obtaining affirmative acknowledgement. Instead, i2 has decided that the better course of action for those customers would be to suspend service until such time as they call into Customer Service and acknowledge the 911 limitations. If they do not acknowledge within 30 days after suspension, their service will be discontinued. The company will continue to aggressively seek affirmative acknowledgment from the 0.09% of customers that have not provided affirmative acknowledgement but have used the service in the past 30 days.

Respectfully submitted,



Russell M. Blau

Ronald W. Del Sesto, Jr.

Counsel for i2 Telecom International, Inc.

cc: Byron McCoy (FCC)
Kathy Berthot (FCC)
Janice Myles (FCC)
Best Copy and Printing, Inc.

I, James R. Rose, state that I am Chief Technology Officer, of i2 Telecom International, Inc.; that I am authorized to submit the forgoing *Subscriber Acknowledgement Report* ("*Report*") on behalf of i2 Telecom International, Inc.; that the *Report* was prepared under my direction and supervision; and I declare under penalty of perjury that the *Report* is true and correct to the best of my knowledge, information, and belief.



Name: James R. Rose
Title: Chief Technology Officer
i2 Telecom International, Inc.